

**REMARKS**

Claims 1-3 are withdrawn from consideration and claim 4 is pending. By this Amendment, claim 4 is amended. No new matter is added. Reconsideration based on the above amendments and the following remarks is respectfully requested.

Applicant confirms his election of Group II directed toward a semiconductor device with traverse. Applicant respectfully submits that the Restriction Requirement is improper, because the method and apparatus claims are so intertwined that the same art must be searched for all pending claims. In fact, the Office Action applies JP 8-330736, which is allegedly directed toward a method of manufacturing a multilayer board (English Abstract), to reject claim 4. Therefore, it is stressed there is no undue burden for performing a prior art search for all of the pending claims. Accordingly, withdrawal of the Restriction Requirement is again respectfully requested although the indication at this interview was the Restriction Requirement will not be reconsidered.

The Examiner is thanked for the many courtesies extended to Applicant's attorney in the course of a personal interview conducted March 9, 2004. The substance of the interview is included herein per MPEP §713.04.

**I. The Claims Define Allowable Subject Matter**

**JP 8-330736**

Claim 4 is rejected under 35 U.S.C. §102(b) as being unpatentable over JP 8-330736. Applicant amends claim 4 to clarify allowable features of claim 4.

As discussed at the interview, JP 8-330736 does not disclose, teach or suggest "the first portion of the first sublayer is located on the substrate," as recited in claim 4.

JP 8-330736 discloses a multilayer board comprising a polyimide film 1 and metal films 5 and 7 as shown in Figure 1. The polyamide film 1 has openings 2, so that the metal

film 5 fills openings 2 formed in film 1. Therefore, the metal film 5 penetrates the film 1 as shown as shown in Figure 1(f), and is not located on a substrate.

Moreover, the Office Action asserts, "JP 8-330736 shows the method as claimed in the abstract and figures 1-2, with metal film 7 being stacked by electroplating to form protrusions." However, metal film 7 does not disclose, teach, or suggest a  $N^{\text{th}}$  sublayer or a  $(N + 1)^{\text{th}}$  sublayer. Further, as discussed at this interview, JP 8-330736 does not disclose, teach, or suggest the structures as recited in apparatus claim 4 regardless of what layers may be asserted as teaching the sublayers recited in claim 4. Accordingly, withdrawal of this rejection is respectfully requested.

JP 02123511

Claim 4 is rejected under 35 U.S.C. §102(b) as being anticipated by JP 02123511. Applicant amends claim 4 to clarify allowable features of claim 4.

As discussed at this interview, JP 02123511 does not disclose, teach or suggest "the first portion of the first sublayer is located on the substrate," or "the sublayers being stacked on a substrate," as recited in claim 4.

The Office Action asserts, "JP 02123511 shows the method as claimed in the abstract and figures 1-2, with metal film 6 being stacked to form protrusions." Applicant respectfully submits, as addressed at this interview, that the metal film 6 is not stacked. Instead, there is only one layer of metal film 6 shown in Figure 1 of JP 02123511. Fig. 1 of JP 02123511 does not show multiple layers. Therefore, metal film 6 does not disclose, teach, or suggest a  $N^{\text{th}}$  sublayer or a  $(N + 1)^{\text{th}}$  sublayer. JP 02123511 does not disclose, teach, or suggest the structures as recited in claim 4 regardless of what layers may be asserted as teaching the sublayers recited in claim 4. Accordingly, withdrawal of this rejection is respectfully requested.

**II. Conclusion**

For at least these reasons, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration, rejoinder of claims 1-3, and prompt allowance of claims 1-4 is earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned attorney at the telephone number listed below.

Respectfully submitted,



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